

Remarks

Applicant has reviewed the Office Action dated as mailed March 15, 2005 and the documents cited therewith. The present application contains claims 1-14 and 16-27.

Claim Rejections under 35 U.S.C. §101

Claims 1-19 were rejected under U.S.C. §101 because the claims were asserted to be directed to a non-statutory subject matter, specifically directed towards a data structure. Applicant respectfully submits that claims 1-19 are method or process claims which are specifically indicated by 35 U.S.C. §101 as being statutory subject matter. Applicant further respectfully submits that there is no reference to data structures in any of claims 1-19. Therefore, applicant respectfully submits that claims 1-19 recite statutory subject matter, and reconsideration and withdrawal of the Section 101 rejection of claims 1-19 is respectfully requested.

Claim Rejections Under 35 U.S.C. §103

Claims 1-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Durston et al. (U.S. PUB. No. 2003/0130849 A1) in view of Ayers (U.S. Patent No. 5,832,531). This rejection is respectfully traversed.

Applicant respectfully submits that the rejection under 35 U.S.C. §103 does not follow M.P.E.P. §706.02(j) which states:

“After indicating that the rejection is under 35 U.S.C. 103, the examiner should set forth in the Office action: ... (B) the difference or the differences in the claim over the applied reference(s), (C) the proposed modification of the applied reference(s) necessary to arrive at the claimed subject matter, and (D) an explanation of why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification... The teaching or suggestion to make the claimed combination and the reasonable expectation of the success must both be found in the prior art and not based on applicant’s disclosure. *In Re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (FED. CIR. 1991).”

As discussed in detail below, Applicant respectfully submits that there is no teaching or suggestion in Durston and Ayers that their teachings may be combined so as to provide the present invention as

recited in the claims and such motivation only comes from Applicant's disclosure. This approach constitutes impermissible hindsight and must be avoided.

Durston teaches an interactive dialogue apparatus that generates prompts and receives responses which it processes and stores as indicated in the abstract of Durston. The interactive dialogue apparatus and methods of Durston are used for automated telephone call routing as further indicated in paragraph 0001 on page 1 of Durston.

In contrast, Ayers teaches a method and apparatus for identifying words described in a page description file. The method and apparatus of Ayers are used for searching for words in a page description file as indicated in the abstract of Ayers. Because Durston teaches an interactive dialogue apparatus and methods for generating prompts and receiving responses for automated telephone call routing and Ayers teaches a method and apparatus for identifying words described in a page description file for searching for words, a person of ordinary skill in the art would not be motivated to combine their teachings so as to provide the present invention as recited in the claims. As required by M.P.E.P. §706.02(j) the teaching or suggestion to make the claimed combination and the reasonable expectation of the success must both be found in the prior art and not based on applicant's disclosure. Neither Durston nor Ayers teach or suggest they may be combined to provide the present invention and such motivation only comes from reading Applicant's application.

Even if it were proper to combine the teachings of Durston and Ayers, they still would not provide the present invention as recited in the claims. The Office Action referenced page 5 paragraph 0104 of Durston for disclosing a method of searching-by-number comprising receiving at least one digit or a sequence of digits and wild cards as recited in claim 1. The Office Action also referenced page 5, paragraphs 0097-0105 for teaching searching any numbers stored in a device to form a match list including any stored numbers matching the at least one digit or the sequence of digits and wildcards as recited in claim 1. Referring to these cited paragraphs of Durston and specifically beginning at paragraph 0099, Durston recites:

“[0099] The following are example of entries in the prompt store in this instance
[0100] state 0.<welcome>|1.2
[0101] state 1exp.<Do_you_want_a line test>|5.0

[0102] state 2exp.<Do_you_want_a_reverse_charge_call>|5.0

[0103] state?exp:state 3.<to which code and number>|1.0

[0104] In this instance the '?' represents a single character of any value. Regular expression languages typically allow wild cards such as 'one or more character', 'zero or more characters', or 'exactly one character' (as shown in the example above)."

Accordingly, Durston teaches expression-matching to select prompts in a prompt store for use in an interactive dialogue apparatus or method. Durston does not teach or suggest searching numbers stored in a device to form a match list including any stored numbers matching at least one digit or a sequence of digits and wild cards as recited by independent claim 1.

The office action admitted that Durston does not teach continuing to receive wild cards until receiving a first digit as recited in independent claim 1 and referenced Ayers at column 17 lines 4-47 for teaching continuing to receive wild cards until receiving a first digit as recited in claim 1 of the present application. As previously discussed, Ayer teaches a method and apparatus for identifying words described in a page description file and is used for searching for words in a page description file. In column 17, lines 4-47, Ayers is describing a flowchart illustrating step 72 of FIG. 4b for determining if the last word in a list (step 75 of FIG. 4b of Ayers) is a word fragment. And then in line 27 of column 17 Ayers is determining if the fragmented word can be concatenated in step 82 of FIG. 4b with the next word on the next line of the page description language file. To illustrate, Ayers in column 17 beginning at line 27 recites:

"FIG. 9 is a flow graph illustrating step 82 of FIG. 4b, where the microprocessor determines if the fragment in the frag buffer and the word in the word buffer can be concatenated. As detailed below, steps 210 and 212 check for concatenating a hyphenated fragment with the next word, and step 214 checks for concatenating a drop-cap fragment with the next word. The process starts at 206. In step 208, the microprocessor checks if the first character of line N+1 is a letter or digit. As referenced herein, "line N" refers to the line to which the fragment in the frag buffer belongs. "Line N+1" is the line following line N, where the first word of line N+1 might be part of the fragment from line N. If the first character of line N+1 is not a letter or digit in step 208, then the fragment is a complete word in itself, and the process continues to step 86 of FIG. 4b to deliver the fragment as a word to the client. If first character is a letter or digit in step 209, the microprocessor checks what type of fragment it is by checking the end character type of the fragment."

Accordingly, Ayers is looking at words or word fragments in a buffer to determine if a last word or word fragment on a line N can be concatenated with a word or word fragment on a next line N+1.

Applicant respectfully submits that Ayers does not teach or suggest continuing to receive wild cards until receiving a first digit nor does Ayers or Durston teach or suggest searching any number stored in a device to form a match list including any stored numbers matching at least one digit or a sequence of digits and wild cards as required by the present invention as recited in independent claim 1.

For all of the reasons discussed above, Applicant respectfully submits that independent claim 1 is patentably distinguishable over Durston and Ayers, whether considered individually or combined, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of claim 1 is respectfully solicited.

With respect to the rejection of claim 2 under 35 U.S.C. §103(a) as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 7, paragraph 0131 discloses displaying the match list. Paragraph 0131 on page 7 of Durston recites:

“...Here the dialogue manager searches the prompt store to find the entry having the longest match to the contents to the history store and for which any conditions contained in the entry are satisfied. At step 212 the prompt is delivered to the synthesizer 12 and the configuration loaded into the recognizer 10 and the classifier 6 ready for the next user input.”

And Durston on page 2, paragraph 0051 teaches:

“...It can instruct a message generator 8 to generate a message that is spoken to the user via the telephone interface using the speech synthesizer 12.”

Accordingly, the synthesizer 12 is a speech synthesizer and the matching prompt is spoken to the user via a telephone interface. There is no teaching or suggestion in Durston of displaying a match list of telephone numbers stored on a device as required by the present invention as recited in claim 2 of the present application.

Additionally, claim 2 depends directly from independent claim 1, and by virtue of that dependency, contains all of the features of independent claim 1. For all of the reasons discussed above, Applicant respectfully submits that claim 2 is also patentably distinguishable over Durston

and Ayers, whether considered individually or combined, and reconsideration and withdrawal of Section 103 rejection of claim 2 is respectfully requested.

Turning now to the rejection of claim 3 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 5, paragraph 0097 teaches ending the search in response to one of: no stored numbers matching the at least one digit or sequence of digits or wild cards and that Durston on page 2, paragraph 0047 teaches ending the search in response to one of a displayed number being selected. Applicant respectfully submits that in reading the citations from Durston, Durston does not teach or suggest the features recited in claim 3. Additionally, claim 3 depends directly from independent claim 1, and by virtue of that dependency, contains all of the features of independent claim 1. Therefore, claim 3 is submitted to also be patentably distinguishable over Durston and Ayers, whether considered individually or combined, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of claim 3 is respectfully solicited.

With respect to the 35 U.S.C. §103 reject of claim 4 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 2, paragraph 0049 discloses performing an intelligent pre-match before displaying any stored numbers matching the at least one digit or sequence of digits and wild cards as recited in claim 4. As defined in the specification of the present application, performing an intelligent pre-match before displaying any stored numbers involves eliminating multiple stored variations of the same phone number. In contrast, Durston on page 2 paragraph 0049 recites:

“The recognizer 10 analyses the received speech utterance and provides as an output a representation of sequences of words or sub-words which most closely resemble the received speech utterance. The representation is assumed, in this example, to consist of the most likely sequence of words or sub-words: (alternatively, a “second-choice” sequence, or some other multiple-choice representation such as the known “graph” representation of the most likely sequences could be provided.”

Accordingly, Applicant respectfully submits that Durston does not teach or suggest performing an intelligent pre-match before displaying any stored numbers matching the at least one digit or the sequence of digits and wild cards as provided by the present invention as recited in claim 4.

Additionally, claim 4 depends directly from claim 1 and by virtue of the dependency contains all of the features of claim 1. Therefore, claim 4 is also submitted to be patentably distinguishable over Durston and Ayers, whether considered individually or combined, and reconsideration and withdrawal of the Section 103 rejection of claim 4 is requested.

Regarding the rejection of claim 5 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 5, paragraph 0105 discloses displaying the match list in a predetermined order. Applicant respectfully submits that in reading paragraph 0105 of Durston, Applicant does not see where Durston teaches displaying the match list in a predetermined order as recited in claim 5 of the present application. Additionally, claim 5 depends directly from independent claim 1 and by virtue of that dependency contains all of the features of claim 1. Therefore, claim 5 is submitted to also be patentably distinguishable over Durston and Ayers, whether considered individually or collectively, and reconsideration and withdrawal of the Section 103 rejection of claim 5 is respectfully requested.

With respect to the 35 U.S.C. §103 rejection of claim 6 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 3, paragraph 0056 discloses displaying the match list in an order corresponding to a position of the at least one digit or sequence of digits and wild cards in any stored numbers. In reading paragraph 0056 of Durston, Applicant does not see where this feature of the present invention is taught by Durston. Additionally, claim 6 depends directly from independent claim 1, and by virtue of that dependency contains all of the features of claim 1. Therefore, Applicant respectfully submits that claim 6 is also patentably distinguishable over Durston and Ayers, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of claim 6 is respectfully requested.

Turning now to the rejection of claim 7 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 7, paragraph 0130-0131 discloses displaying the match list in the order that the at least one digit or sequence of digits and wild cards are positioned from left to right in any stored numbers as recited in claim 7 of the present

application. Applicant respectfully submits that a reading of paragraph 0130-0131 of Durston does not appear to teach or suggest the features of the present invention as recited in claim 7.

Additionally, claim 7 directly from independent claim 1, and by virtue of that dependency contains all of the features therein. Accordingly, Applicant respectfully submits that claim 7 is also patentably distinguishable over Durston and Ayers, and reconsideration and withdrawal of the Section 103 rejection of claim 7 is requested.

Turning now to the rejection of claim 8 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 2, paragraph 0048 teaches displaying only one stored number of a group of stored numbers in the match list that are variations of the same phone number as recited in claim 8 of the present application. Paragraph 0048 of Durston recites:

“The program 113 operates in accordance with the architecture represented by the functional block diagram shown in FIG. 2. A user’s speech utterance (received by the network card 111 of FIG. 1) is fed to a speech recognizer 10. The received speech utterance is analyzed by the recognizer 10 with reference to a language model 22, which is one of a plurality (not shown) of possible language models. The language model 22 represents sequences of words or sub-words which can be recognized by the recognizer 10 and the probability of these sequences occurring.”

Applicant respectfully submits that paragraph 0048, as recited above, does not teach or suggest displaying only one stored number of a group of stored numbers in the match list that are variations of a same phone number as recited in claim 8 in the present application. Furthermore, claim 8 depends directly from claim 1 and therefore contains all of the features of claim 1. Accordingly, claim 8 is also submitted to be patentably distinguishable over Durston and Ayers, and reconsideration and withdrawal of the Section 103 rejection of claim 8 is respectfully solicited.

With respect to the rejection of claim 9 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 6, paragraph 0119 discloses the searching is accomplished at least in part by searching a call list, a missed call list, and a phone book as provided by the present invention in claim 9. Paragraph 0119 of Durston recites:

“An inference rule can also be used to add information to the blackboard store 28, such as area code from another source (such as CLI). For example, if a user who gives a phone

number without an area code, it is entirely appropriate to ask 'is that 01473?' based on an assumption that the phone number is local (this is something operators naturally do)."

Thus, Durston in paragraph 0119 teaches adding information such as area code or generating a prompt to ask a user to verify the number without an area code as indicated in paragraph 0119. Applicant respectfully submits that there is no teaching or suggestion in paragraph 0119 of Durston of searching for telephone numbers let alone searching in a call list, a missed call list and a phone book in a device as provided by the present invention as recited in claim 9.

Additionally, claim 9 depends directly from independent claim 1. By virtue of that dependency, claim 9 contains all of the features of claim 1 and is therefore also submitted to be patentably distinguishable over Durston and Ayers. Reconsideration and withdrawal of the 35 U.S.C. §103 rejection of claim 9 is also respectfully solicited.

Regarding the rejection of claim 10 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, the Office Action asserted that Durston on page 2, paragraph 0051 teaches the call list, the missed call list and the phone book are searched in a pre-determined order. Paragraph 0051 of Durston recites:

"A dialogue manager 4, which will be described more fully later, forms the heart of the system. It serves to control the dialogue, using information from a dialogue model 18. It can instruct a message generator 8 to generate a message, which is spoken to the user via the telephone interface using the speech synthesizer 12. The message generator 8 uses information from a message model 14 to construct appropriate messages. The speech synthesizer uses a speech unit database 16 which contains speech units representing a particular voice. The dialogue manager 4 also instructs the recognizer 10 which language model to use for recognizing a user's response to the particular generated message, and also instructs the classifier 6 as to the semantic model to use for classification of the response."

Accordingly, Applicant respectfully submits that Durston does not teach or suggest searching the call list, the missed call list and the phone book in a predetermined order as provided by the present invention in claim 10. Additionally, claim 10 depends directly from independent claim 1 and by virtue of that dependency contains all the features of claim 1. Therefore, Applicant respectfully submits that claim 10 is also patentably distinguishable over Durston and Ayers, whether considered

individually or combined, and reconsideration and withdrawal of the Section 103 rejection of claim 10 is respectfully solicited.

Turning now to the rejection of claim 11 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, claim 11 depends directly from independent claim 1 and by virtue of that dependency contains all of the features of claim 1. Accordingly, claim 11 is submitted to also be patentably distinguishable over Durston and Ayers, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of claim 11 is requested.

With respect of the rejection of claim 12 under 35 U.S.C. §103 as being unpatentable over Durston in view of Ayers, Applicant respectfully submits that Durston does not teach or suggest selecting a search-by-number feature from a menu by voice activation. Furthermore, claim 12 depends directly from independent claim 1. Because of that dependency, claim 12 contains all of the features of independent claim 1. Thus, claim 12 is submitted to also patentably distinguish over Durston and Ayers, whether considered individually or combined, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of claim 12 is respectfully requested.

Claims 13-14 and 16-27 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brown et al. (U.S. Patent No. 6,026, 398) in view of Ayers. This rejection is respectfully traversed.

Application respectfully submits that the rejection under 35 U.S.C. §103 does not follow M.P.E.P. §706.02(j) which is recited above. As discussed in more detail below, Applicant respectfully submits that there is no teaching or suggestion in Brown or Ayers that their teachings may be combined so as to provide the present invention as recited in the claims and such motivation only comes from Applicant's disclosure. Using Applicant's disclosure as a template constitutes impermissible hindsight and must be avoided as indicated in M.P.E.P. §706.02(j).

Brown teaches a system and methods for searching and matching databases. As discussed above Ayers teaches a method and apparatus for identifying words described in a page description file that can be used for searching for words in the page description file. Applicant respectfully

submits that there is no teaching or suggestion in Brown or Ayers that their teachings may be combined to provide the present invention as recited in the claims. Even if it were proper to combine the teachings of Brown and Ayers, they still would not provide the present invention as recited in the claims.

Turning initially to the rejection of independent claim 13 under 35 U.S.C. §103(a) as being unpatentable over Brown in view of Ayers, page 2, paragraph 0051 of Brown was cited for teaching a method of searching-by-number, comprising receiving a first entry. However, Brown is divided into columns with line numbers and there is no page 2, paragraph 0051 in Brown. Clarification is respectfully requested so that Applicant can effectively respond to this rejection.

Brown in column 19 lines 54-67 and Brown in column 20, lines 1-17 were cited for teaching searching the match list for numbers matching a sequence of entered digits and wild cards in response to receiving each additional entry that is a digit as provided by the present invention as recited in claim 13. Column 19 of Brown beginning at line 54 and continuing on column 20 recites:

“The invention may also incorporate an alternative indexing mechanisms used in conjunction with the Soundex indexing mechanism previously described. For instance, FIG. 14 shows an example phone number 111 received as part of the input data search. The phone number 111 may be used to derive combinations 110 of phone numbers which closely resemble the input phone number 111. The question marks “?” in the phone number combinations 110 represent wild card characters. A phone number index of the database, much like a phone book, created beforehand, contains phone number entries, each referencing a corresponding database record containing that phone number. The derived phone number combinations 110 are compared against the phone number index to identify match records referenced by each matching index entry.”

Accordingly, Brown teaches deriving combinations 110 (FIG. 14 of Brown) of phone numbers which closely resemble the input phone number 111. Brown does not teach or suggest “searching any stored numbers to form a match list including any of the stored numbers with a digit in a first position and higher order positions in a sequence of digits forming each stored number” as required by the present invention as recited in independent claim 13. Brown, as cited above, Also teaches that the derived phone number combinations 110 are compared against the phone number index to identify match records referenced by each matching index entry. Accordingly, Brown does not teach

or suggest “searching the match list for numbers matching a sequence of entered digits and wild cards in response to receiving each additional entry that is a digit” as required the present invention as recited in independent claim 13.

The Office Action on page 6 also admits that Brown does not teach receiving an additional entry if the first entry is a wild card and repeating receiving an additional entry until a digit is received. The Office Action asserts that Ayers at column 17 lines 4-47 teaches receiving an additional entry if the first entry is a wild card and repeating receiving an additional entry until a digit is received. As discussed with respect to independent claim 1, the cited portion of Ayers teaches determining whether a word or word fragment is continued on the next line of a page description language file, and Ayers does not teach or suggest receiving an additional entry if the first entry is a wild card and repeating receiving additional entries until a digit is received as required by the present invention as recited in independent claim 13.

For all of the reasons discussed above, Applicant respectfully submits that independent claim 13 is patentably distinguishable over Brown and Ayers, whether considered individually or collectively, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of independent claim 13 is respectfully solicited.

Turning to the rejection of claim 14 under 35 U.S.C. §103 as being unpatentable over Brown in view of Ayers, column 8, lines 1-16 of Brown were cited for disclosing further comprising displaying the match list. Column 8, lines 1-16 of Brown recite:

“FIG. 2 shows the general nature of processing of the invention. Input search data 10 is entered into a field mapper 11. The input search data 10 may be obtained, for example, from a user via a graphical user interface, or may be obtained indirectly from a program accessing a database whose records are to be matched against the database 15 searched by the invention...”

Thus, Brown teaches inputting search data 10 via a graphical user interface but does not teach or suggest displaying a match list. Additionally, as discussed above Brown does not even teach or suggest forming a match list as recited in independent claim 13 from which claim 14 directly depends. Further, claim 14 as depending from claim 13 contains all of the features of claim 13.

Accordingly, Applicant respectfully submits that claim 14 is patentably distinguishable over Brown and Ayers, whether considered individually or combined, and reconsideration and withdrawal of the Section 103 rejection of claim 14 is respectfully solicited.

Regarding the rejection of claim 16 under 35 U.S.C. §103 as being unpatentable over Brown in view of Ayers, Brown at column 19 lines 54-67 and continuing on column 20 lines 1-17 was cited for teaching displaying a new match list including any numbers matching the sequence of entered digits and wild cards from a previous match list as recited in claim 16 of the present invention. As previously discussed Brown in column 19 lines 54-67 and continuing on column 20 teaches deriving combinations 110 of phone numbers which closely resemble the input phone number 111 (see FIG. 14 of Brown). The derived phone number combinations 110 are then compared against a phone number index to identify match records referenced by each matching index entry. Applicant respectfully submits that there is no teaching or suggestion in Brown of displaying a new match list including any numbers matching the sequence of entered digits and wild cards from a previous match list as recited in claim 16. Additionally, claim 16 depends directly from independent claim 13 and by virtue of that dependency contains all of the features of independent claim 13. Accordingly, Applicant respectfully submits that claim 16 is also patentably distinguishable over Brown and Ayers, whether considered individually or combined, and reconsideration and withdrawal of the Section 103 rejection of claim 16 is respectfully requested.

With regard to the rejection of claim 17 under 35 U.S.C. §103 as being unpatentable over Brown in view of Ayers, the Office Action cited column 19 lines 54-67 and continuing on column 20, lines 1-17 as teaching receiving additional entries until a predetermined number of digits and wild cards are entered. As previously discussed, this portion of Brown merely teaches deriving combinations 110 (FIG. 14) of phone numbers which closely resemble the input phone number 111. Thus, no additional digits are being received because Brown merely forms complete phone numbers with wild cards as shown in FIG. 14 of Brown. Therefore, Applicant respectfully submits that Brown does not teach or suggest receiving additional entries until a predetermined number of digits and wild cards are entered because the digits and wild cards are merely formed by Brown from the input phone number 111. Additionally, claim 17 depends directly from independent claim 13.

Because of this dependency, Claim 17 contains all of the features of independent claim 13. Therefore, claim 17 is submitted to also be patentably distinguishable over Brown and Ayers, whether considered individually or collectively, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of claim 17 is respectfully requested.

Turning now to the rejection of claim 18 under 35 U.S.C. §103 as being unpatentable over Brown in view of Ayers, Ayers in column 7 lines 48-67 and Ayers column 10 lines 1-36 were cited for teaching the features of claim 18. Applicant respectfully submits that in reading the cited portions of Ayers, Ayers does not appear to teach or suggest ending the method in response to the occurrence of one of receiving a predetermined signal; failing to match any numbers in the match list; and receiving a predetermined number of digits and wild cards as required by the present invention in claim 18. Furthermore, claim 18 depends directly from independent claim 13. Because of that dependency, claim 18 contains all of the features of independent claim 13. Therefore, Applicant respectfully submits that claim 18 is also patentably distinguishable over Brown and Ayers, and reconsideration and withdrawal of the Section 103 rejection of claim 18 is respectfully requested.

Turning now to the rejection of claim 19 under 35 U.S.C. §103 as being unpatentable over Brown in view of Ayers, column 12 lines 38-60 of Ayers were cited for teaching the features of claim 19. Claim 19 depends directly from claim 18 which depends directly from independent claim 13. By virtue of these dependencies, claim 19 contains all of the features of claim 18 and independent claim 13. Accordingly, Applicant respectfully submits that claim 19 is patentably distinguishable over Brown and Ayers for the same reasons discussed with respect to claims 18 and 13. Reconsideration and withdrawal of the rejection of claim 19 is, therefore, respectfully solicited.

Turning now to the rejection of independent claim 20 under 35 U.S.C. §103 as being unpatentable over Brown in view of Ayers, claim 20 recites similar features to independent claim 13. Accordingly, for the same reasons discussed with respect to independent claim 13, independent claim 20 is submitted to also be patentably distinguishable over Brown and Ayers, whether

considered individually or combined. Therefore, reconsideration and withdrawal of the Section 103 rejection of claim 20 is respectfully requested.

With respect to the rejection of claims 21, 22, 23 and 24, these claims recite additional features which further patentably distinguish over Brown and Ayers. Additionally, these claims depend either directly or indirectly from independent claim 20 and because of that dependency, contain all of the features of claim 20. Therefore, Applicant respectfully submits that these claims are also patentably distinguishable over Brown and Ayers, and reconsideration and withdrawal of the 35 U.S.C. §103 rejection of these claims is respectfully requested.

Regarding the rejection of independent claim 25 under 35 U.S.C. §103 as being unpatentable over Brown in view of Ayers, claim 25 contains similar features to independent claim 13. For the same reasons discussed with respect to independent claim 13, claim 25 is submitted to also patentably distinguish over Brown and Ayers whether considered individually or combined. Reconsideration and withdrawal of the Section 103 rejection of independent claim 25 is, therefore, respectfully requested.

With respect to the rejection of claims 26 and 27 under 35 U.S.C. §103, these claims are also submitted to recite additional features which further patentably distinguish over Brown and Ayers. Additionally, claims 26 and 27 depend directly or indirectly from independent claim 25, and by virtue of that dependency, contain all of the features of claim 25. Accordingly, claims 26 and 27 are also submitted to be patentably distinguishable over Brown and Ayers, and reconsideration and withdrawal of the Section 103 rejection of these claims is respectfully solicited.

Conclusion

For the foregoing reasons, the Applicant respectfully submits that all of the claims in the present application are in condition for allowance. Reconsideration and withdrawal of the rejections and allowance of the claims at the earliest possible date are respectfully solicited.

If the Examiner has any questions about the present Amendment or anticipates finally rejecting any claim of the present application, a telephone interview is requested.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 13-4365.

Respectfully submitted,

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